

In the Matter of **WT 95-57**)
)
Amendments to the amateur)
service rules including ...)
eligibility for a club station license)

11 July 1995
510 East Wistaria Avenue
Arcadia California 91006

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
1919 M Street Northwest
Washington DC 20554

RECEIVED

JUL 17 1995

Commissioners:

FCC MAIL ROOM

We write to identify an abuse of the amateur radio club station licensing system now taking place and to suggest additional language the Commission should include as part of this rulemaking to prevent such activities.

Ms. Boettcher is an Amateur Radio Technician class licensee and holds the station callsign KB0QJJ; Mr. Tarsala holds an Amateur Extra class license and primary station callsign WB6VRN, and he is the trustee for the amateur radio club station W6VIO at the National Aeronautics and Space Administration Jet Propulsion Laboratory.

Together, we have discovered that the five members of the Tucker family of La Mirada, California have collected at least thirty-four amateur radio club station licenses since such licenses became available again this past spring. The Tuckers now hold 19.3% of all the new

No. of Copies rec'd 0+9
List A B C D E WT

WT 95-57

Comments of C.M. Boettcher and J.A. Tarsala

11 July 1995

amateur radio club station licenses issued by the FCC in the Sixth Amateur Radio Callsign District. A compilation of the multiple licenses held by each member of the Tucker family (as of 10 July 1995) is included in Appendix A for the inspection of the Commission. We believe that the activities of the Tucker family are a clear and egregious abuse of the amateur radio club station licensing process. Their activities run contrary to the intent of the Commission in re-opening applications for club station licenses, and based on a conversation one of us (JT) had with Mr. Roy Tucker, we have reason to believe that these are not *bona fide* amateur radio clubs.

Note, however, that the five members of the Tucker family would not have their activities hampered in any way by the new requirement proposed in Paragraph (3) of WT 95-57, which asserts that "Requiring four members, rather than two, would assist in ensuring that radio clubs are *bona fide* organizations. Accordingly, we propose to increase the eligibility requirement to four persons for a club station license." This requirement is easily circumvented by determined individuals.

We propose that the Commission instead adopt new language that could effectively thwart the type of abuse perpetrated by the Tucker family:

"No person shall concurrently be the club station trustee for more than one [or two] amateur radio club station license[s]."

Such language halts the excessive processing demands placed on the FCC staff by multiple, frivolous applications. It also focuses attention of the club station trustee on a limited number of station licenses so as to more fully ensure the faithful discharge of the duties accepted by

WT 95-57

Comments of C.M. Boettcher and J.A. Tarsala

11 July 1995

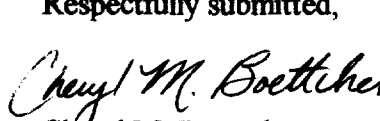
the person in that office, and potentially encourages a larger number of amateur radio operators to participate as club trustees.

To achieve conformity with this new rule, the Commission in its *Report and Order* should furthermore set a timetable of divestiture for trustees having an excessive number of amateur radio club station licenses, after which the Commission should act to cancel any excess trusteeships still held. We ask that proactive steps be taken to purge the amateur radio callsign database of spurious "clubs" and to prevent a holder of numerous primary and club station licenses from unfairly using a numerically advantageous position when the Commission activates the amateur radio vanity callsign process in the near future.

We truly regret that the actions of one family should so clearly demonstrate the need for an additional regulation for the amateur radio service, but we consider the preservation of the amateur radio club callsign system paramount. We also wish to shield the FCC staff from the excessive license requests of a minority of license holders in order to allow it to concentrate on serving the majority of clubs and stations who request only a modest number of transactions each.

We thank the Commission for its consideration of our comments in this matter.

Respectfully submitted,


Cheryl M. Boettcher


Jan A. Tarsala

WT 95-57

Comments of C. M. Boettcher and J. A. Tarsala
11 July 1995

APPENDIX A

Club Station Licenses Held by the Tucker Family

Held by Roy Tucker, N6TK:

KE6SPU	Southern California Amateur Radio Club
KE6SQA	La Mirada Civic Amateur Radio Club
KE6SWP	Mighty Wonderful Repeater Association
KE6SWR	Southern California Six Meter Club
KE6SZP	Patriotic Amateur Radio Club
KE6TDB	Antique Amateur Radio Club of Southern California
KE6TXB	Los Angeles County Repeater Project
KE6TZI	Shangri La Amateur Radio Club
KE6UVH	Illibuck Amateur Radio Club

Held by Kathryn Tucker, AA6TK:

KE6SPV	Southern California Amateur Radio Association
KE6SPZ	La Mirada Municipal Amateur Radio Club
KE6SWO	Mighty Wonderful Repeater Association Auxiliary
KE6SWQ	Southern California Six Meter Club Auxiliary
KE6SZQ	Patriotic Amateur Radio Club Auxiliary
KE6TDA	Historical Amateur Radio Club of Southern California
KE6TXC	Orange County Repeater Project
KE6TZH	Erewhon Amateur Radio Club
KE6UVG	Illibuck Amateur Radio Association

Held by Eric Tucker, AA6ET:

KE6SWM	Arbol Olivo Amateur Radio Club
KE6SWN	Olive Tree Amateur Radio Club
KE6TNT	Aardvark Amateur Radio Club
KE6TXG	Southern California Amateur Radio Group
KE6UEQ	Los Angeles Amateur Radio Association
KE6UEP	Los Angeles Amateur Radio Club
KE6VIH	Victory Amateur Radio Club
KE6VII	Thunder and Lightning Amateur Radio Club

Held by Kent Tucker, AA6KT:

KE6SZN	Watertown Amateur Radio Society
KE6SZO	Adirondack Amateur Radio Society
KE6TNU	Doodlebug Amateur Radio Club
KE6TXF	Southern California Amateur Radio Organization
KE6VCN	Golden State Amateur Radio Club
KE6VCO	Golden State Amateur Radio Club (yes, really a duplicate name)

Held by Nancy Tucker, NOYRY:

KE6UWR	Empire State Amateur Radio Society
KE6UWS	Jefferson County Amateur Radio Society